

Privacy Notice

INTRODUCTION

This is Epoq Legal Ltd's privacy notice.

We respect your privacy and are committed to protecting your personal data. This privacy notice will tell you how we look after your personal data when you visit this website (wherever you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below.

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IMPORTANT INFORMATION AND WHO WE ARE

1. **Purpose of this privacy notice**
2. This privacy notice gives you information about how Epoq Legal Ltd collects and deals with your personal data when you use this website. In this privacy notice, we use the word process to cover all the different ways in which we handle your personal data, such as collection, use, storage and transfer.
3. The purpose of this website is to promote our products and services to other businesses. We respect that you may give us, or we may otherwise collect, information about you when you are acting in a professional capacity (e.g. as an officer, employee or representative of a business). We only process your personal data in the context of, and for the purpose of, our business-to-business dealings and communications.
4. This website is not intended for children and we do not knowingly collect data relating to children.
5. It is important that you read this privacy notice, as well as any other privacy notice we may give you on specific occasions when we are processing personal data about you, so you know how and why we are using your personal data.

6. **Controller**

7. Epoq Legal Ltd (referred to as **we, our, us** in this privacy notice) is the **controller**. In other words, we decide when, why and how to process your personal data and we are responsible for looking after it and protecting your rights.
8. We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

9. **Contact details**

10. Our full details are:

Full name of legal entity: Epoq Legal Ltd

Data privacy manager: dataprivacy@epoq.co.uk

Postal address: Unit 2, 2 Imperial Place, Maxwell Road, Borehamwood, Hertfordshire, WD6 1JN

11. You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us first.
12. Epoq Legal Ltd will be authorised and regulated by the Solicitors Regulation Authority from 15 January 2019 (SRA number 645296).

13. **Changes to the privacy notice and your duty to inform us of changes**

14. This version was last updated on 10 December 2018.
15. It is important that the personal data we hold about you is accurate and current. Please tell us if your personal data changes during your relationship with us.

16. **Third-party links**

17. This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third parties and are not responsible for how they deal with your personal data, so we encourage you to read their privacy notices before allowing them to process your personal data.

THE DATA WE COLLECT ABOUT YOU

1. Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (**anonymous data**).
2. We may process different kinds of personal data about you which we have grouped together as follows:
 - a. **Contact Data** includes name(s), address, email address and telephone numbers.

- b. **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.
 - c. **Profile Data** includes, your interests, preferences, feedback and survey responses.
 - d. **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
 - e. **Usage Data** includes information about how you use our website and your session activity.
3. We collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of visitors accessing a specific website feature or the frequency with which certain enquiries are made, so that we develop resources to deal with common questions more efficiently. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

HOW IS YOUR PERSONAL DATA COLLECTED?

1. We use different methods to collect data from and about you including through:
 - a. **Direct interactions.** You may give us your personal data by filling in forms on this website or by corresponding with us by post, phone, email or otherwise. This also includes personal data you provide when you:
 1. request a product or service demonstration;
 2. request our publications to be sent to you;
 3. enter a competition, promotion or survey; or
 4. give us some feedback.
 - b. Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie notice for further information.
 - c. **Third parties.** We may receive Technical and Usage Data from analytics providers such as Google based outside the EU.
2. When we obtain information about you from third parties or publicly available sources rather than from you directly, we will notify you of any relevant information obtained, for example, the type of personal data, within a reasonable period.

HOW WE USE YOUR PERSONAL DATA

1. We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- a. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. **Legitimate Interests** means our interests in developing our business, products and services; protecting our business; and managing it efficiently. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
 - b. Where we need to comply with a legal or regulatory obligation. **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.
2. We rely on consent as a legal ground for processing your personal data in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw your consent to receive such communications at any time. You can do this by contacting us.
 3. Generally, however, we do not rely on consent as a legal ground for processing your personal data except in the circumstances described above.
 4. **Purposes for which we will use your personal data**
 5. We have set out below a description of all the ways we plan to use your personal data, and which of the legal grounds we rely on to do so. We have also identified what our legitimate interests are where appropriate.
 6. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out below.

| Purpose/Activity | Legal ground for processing and (where applicable) nature of legitimate interest |
|---|---|
| To develop commercial leads, negotiate commercial arrangements and agree contract documentation with clients, we will process Contact Data. | Necessary for our legitimate interests (for running our business) |
| To notify you about changes to our terms of business or privacy notice and sending other service communications to you, we will process Contact Data. | (1) Necessary to comply with a legal or regulatory obligation (2) Necessary for our legitimate interests (to keep our records updated to protect our business) |

| Purpose/Activity | Legal ground for processing and (where applicable) nature of legitimate interest |
|--|---|
| To ask you for feedback or to complete surveys and to evaluate responses, we will process Contact Data and Profile Data. | Necessary for our legitimate interests (to evaluate feedback for the purposes of developing and growing our business) |
| To send marketing communications to you (in your professional capacity) and make suggestions and recommendations to you about products or services that may be of interest to your business, we will process Contact Data, Marketing and Communications Data, Profile Data, Technical Data and Usage Data. | Necessary for our legitimate interests (to develop our products/services and grow our business) |
| To ensure that we do not send marketing communications to you if you have indicated that you do not wish to receive these, we will process Contact Data and Marketing and Communications Data | Necessary to comply with a legal obligation |
| To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data), we will process Contact Data and Technical Data | (1) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (2) Necessary to comply with a legal obligation |
| To identify possible developments and improvements to our website, products/services, marketing, customer relationships and experiences, we will process Contact Data, Profile Data, Technical Data and Usage Data. | Necessary for our legitimate interests (to study how customers use our website, to develop them and to inform our business development strategy) |

7. Marketing

8. Our marketing is only intended for the business that you are an officer of, work for or represent and is, therefore, sent to you in your professional capacity. We do not send any marketing communications to you in your private capacity. Nonetheless, you can ask us to stop sending you marketing messages at any time by following the opt-out link on any marketing message sent to you or by contacting us at any time.
9. We do not share your personal data with any outside company for marketing purposes.
10. Subject to that, we may use your Contact Data, Profile Data, Technical Data and Usage Data to form a view on what we think your business may want or need, or what may be of

interest to your business. This is how we decide which products, services and offers may be relevant for your business (we call this marketing).

11. You may receive marketing communications from us if you have requested information from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

12. Cookies

13. When we provide services, we want to make them easy, useful and reliable. This sometimes involves placing small amounts of information on your computer. These are called 'cookies'.

14. These cookies are used to improve services for you through:

1. Letting you navigate between pages efficiently
2. Enabling a service to recognise your computer so you don't have to give the same information during one task
3. Recognising that you have already given a username and password so you don't need to enter it for every web page requested
4. Measuring how many people are using services, so they can be made easier to use and that there is enough capacity to ensure they are fast

15. You can learn more about cookies from AllAboutCookies.org or www.youronlinechoices.eu.

16. Users typically have the opportunity to set their browser to accept all or some cookies, to notify them when a cookie is issued, or not to receive cookies at any time. The last of these, of course, means that personalised services cannot be provided and the user may not be able to take full advantage of all of a website's features. Refer to your browser's Help section for specific guidance on how it allows you to manage cookies and how you may delete cookies you wish to remove from your computer.

17. Multiple cookies may be found in a single file depending on which browser you use.

18. The cookies used on this website have been categorised as follows:

19. Category 1: strictly necessary cookies

20. These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies services you have asked for, like shopping baskets or e-billing, cannot be provided.

21. Category 2: performance cookies

22. These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

23. Category 3: functionality cookies

24. These cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. For instance, a website may be able to provide you with local weather reports or traffic news by

storing in a cookie the region in which you are currently located. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as a live chat session. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

25. The list below shows the cookies that we use, other than those that are strictly necessary to this service. If you have any queries about these, or would like more information, please contact us.

26. Performance cookies

27. **Google Analytics** sets cookies (**_ga, _gat, _gid**) to help us accurately monitor the number of unique visitors to various parts of our website and the volumes of usage. Data is only used in aggregate.

28. For further details on the cookies set by Google Analytics, please refer to the Google Code website.

29. To provide website visitors with more choice on how their data is collected by Google Analytics, Google has developed the Google Analytics Opt-out Browser Add-on. The add-on communicates with the Google Analytics JavaScript (analytics.js) to indicate that information about the website visit should not be sent to Google Analytics.

30. If you want to opt out, download and install the add-on for your current web browser. The Google Analytics Opt-out Browser Add-on is available for Internet Explorer, Google Chrome, Mozilla Firefox, Apple Safari and Opera.

31. **Google Ad Services** sets the **AID** cookie to help us with conversion tracking. Conversion tracking involves recording the movements of visitors on this website. The recorded data is then used to find out which aspects of our website design and customer journey are working and which ones aren't.

32. Functionality cookies

33. **Cloudflare** uses the cookie **_cfduid** for security and threat detection purposes.

34. **Facebook login** uses cookies (**fbm_{website_facebook_account}**, **fbsr_{website_facebook_account}**) to enable you to log in to this website from Facebook.

35. We use **localStorage** to save the state of different parts of this website, as follows:

0. {selectortype}_selector - stores the answers to a document selector or legal healthcheck to show your saved results when you return (this stores personal information due to the nature of the selector but is not used anywhere else except re-populating the questionnaire); and

1. {customerid}.filters - stores the options used to filter or sort your saved documents.

36. By using this website, you agree that we can place these types of cookies on your device.

37. Change of purpose

38. We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible

with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

39. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal ground which allows us to do so.
40. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

DISCLOSURES OF YOUR PERSONAL DATA

1. We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above:
 1. Our service providers based in the UK and the Republic of Ireland who provide IT and system administration services.
 2. Professional advisers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
 3. HM Revenue & Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances, including where disclosure is required to a law enforcement agency, e.g. where we know or suspect that a transaction may involve such illegal activities as money laundering or terrorist financing.
 4. Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
2. We require all third-party service providers processing your personal data for us to respect the security of your personal data and to treat it in accordance with the law. We do not allow them to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

INTERNATIONAL TRANSFERS

1. We do not transfer your personal data outside the European Economic Area (**EEA**)

DATA SECURITY

1. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
2. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

DATA RETENTION

1. **How long will you use my personal data for?**

2. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
3. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
4. Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.
5. In some circumstances you can ask us to delete your data: see below for further information.
6. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

YOUR LEGAL RIGHTS

1. Under certain circumstances, you have rights under data protection laws in relation to your personal data.
2. You have the right to:
 - a. **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
 - b. **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
 - c. **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
 - d. **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms

- e. **Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following situations:
 - i. if you want us to establish the data's accuracy;
 - ii. where our use of the data is unlawful but you do not want us to erase it;
 - iii. where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - iv. you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
 - f. **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
 - g. **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
3. If you wish to exercise any of the rights set out above, please contact us.
4. **No fee usually required**
5. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
6. **What we may need from you**
7. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
8. **Time limit to respond**
9. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.